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VIA ECOURTS

Honorable Anun Subramanian, U.S.D.J. United States District Court Southern District of New York 500 Pearl Street, Courtroom 15A New York, New York 10007

Re: Go Global Retail, LLC v. Dream on Me Industries, Inc., et al. Civil Action No. 1:23-cv-07987

Dear Judge Subramanian:

This firm represents defendants, Dream on Me Industries, Inc. and Dream on Me, Inc. (collectively "DOM") in the above referenced matter. I write today on behalf of DOM to respectfully request an extension of the deadline to file summary judgment motions in this matter from December 6, 2024 to December 20, 2024. Additionally, we request that opposition briefs be due on January 9, 2025 and reply briefs be due on January 16, 2025.

This is the second request for extension of the summary judgment deadlines. The Parties previously jointly requested an extension on October 11, 2024 which Your Honor granted. See ECF 57. This initial extension moved the deadline for the filing of summary judgment motions from November 4, 2024 to December 6, 2024, Notably, the original deadline for summary judgment motions was only two weeks after the discovery end date. We have met and conferred with counsel for Go Global Retail, LLC, and they have consented to our request. There are presently no scheduled appearances before the Court in this matter, and there are no other deadlines currently scheduled in this case. Therefore, this request will not impact any other existing deadlines.

In this case, the parties have exchanged tens of thousands of documents, conducted nine depositions and served expert reports, so the case material at issue in this case is significant. We request the extension of these deadlines at this time because of the holidays, pre-planned travel by certain attorneys in early December and between Christmas and New Years when the current briefing deadlines would fall, as well as the requirements of other matters.

If this request meets with Your Honor's approval, we respectfully request that Your Honor "So Order" this letter. Thank you for Your Honor's consideration of this request.

Respectfully submitted,

GREENBAUM, ROWE, SMITH & DAVIS LLP

/s/ Thomas K. Murphy III

TKM THOMAS K. MURPHY III

cc: All Counsel of Record (via ECF)